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**RE: EBR Registry Number: RA06E0024**  
**Proposal Title: Ban on the Incineration of Tires**

Please accept this as my formal comment on the above noted Proposal.

I adamantly oppose this proposal as it is currently worded. Currently, the proposed ban does not apply to any facility with approval to incinerate tires issued before the ban is in effect. This means that Loyalist Township is the only municipality that is exempted from this ban, since Lafarge Canada – Bath plant, was granted a Certificate of Approval on the same day as this proposed ban was registered, Dec. 21, 2006. This ban, effectively, makes Loyalist Township, and neighbouring municipalities a “science experiment” for the rest of the province.

Within your proposal, the Ministry states that no facility in Ontario incinerates tires. As a result, the MOE admits that it has no experience monitoring the environmental performance of facilities that incinerate tires. The purpose of this proposed time-limited ban is to allow for the collection of information confirming the environmental performance of facilities using tires as fuel. If a ban is introduced, MOE will not issue any new approvals for the incineration of tires until this information has been obtained.

I feel that this proposed test study is negligent to both the health of the people and their environment. I simply ask that this government adhere to the precautionary principal. **You admit that you cannot confirm that this procedure will not harm the environment, without that certainty, it is your responsibility to reject this procedure outright on a precautionary basis.**

There is an alternative. **I request that the MOE propose an amended resolution requesting a province wide ban on the incineration of tires until such a time as an environmental assessment is completed.** Throughout the world, there is a wealth of studies and reports that suggest that burning tires in cement kilns leads to an increase in toxic emissions. Study this process from the available science, not from the experimentation on local residents; collect your information confirming the safety of this process BEFORE you begin. To do otherwise is reckless and displays a complete disregard for the people of the affected area and their environment.

Trusting this is satisfactory,